

WILLIAM L. JUSKA, JR.  
JAMES L. ROSS\*  
ERIC E. LENOK  
JOHN J. WALSH\*  
PATRICK J. BONNER\*  
PETER J. GUTOWSKI  
MARK F. MULLER  
WAYNE D. MEEHAN\*  
DON P. MURNANE, JR.△  
THOMAS M. RUSSO  
THOMAS M. CANEVARI†  
MICHAEL FERNANDEZ\*  
JOHN F. KARPOUSIS\*△  
MICHAEL E. UNGER\*†  
WILLIAM J. PALLAS\*  
GINA M. VENEZIA\*△  
JUSTIN T. NASTRO\*  
MANUEL A. MOLINA  
DANIEL J. FITZGERALD\*†△  
BARBARA G. CARNEVALE\*  
JAN P. GISHOLT†  
SUSAN LEE\*  
ERIC J. MATHESON\*  
MICHAEL D. TUCKER\*  
WILLIAM H. YOST\*  
YAAKOV U. ADLER  
MICHAEL J. DEHART  
MATTHEW J. PALLAY\*

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**  
80 PINE STREET  
NEW YORK, N.Y. 10005-1759  
TELEPHONE (212) 425-1900  
FACSIMILE (212) 425-1901  
E-MAIL: [reception@freehill.com](mailto:reception@freehill.com)  
[www.freehill.com](http://www.freehill.com)

NEW JERSEY OFFICE  
549 SUMMIT AVENUE  
JERSEY CITY, N.J. 07306-2701  
TELEPHONE (973) 623-5514  
FACSIMILE (973) 623-3813

CONNECTICUT OFFICE  
246 MARGHERITA LAWN  
STRATFORD, CT 06615  
TELEPHONE: (203) 921-1913  
FACSIMILE (203) 358-8377

OF COUNSEL  
PATRICK J. BONNER

April 12, 2016

Our Ref: 482-1402/MF/GMV

\* ALSO ADMITTED IN NEW JERSEY  
† ALSO ADMITTED IN CONNECTICUT  
△ ALSO ADMITTED IN WASHINGTON, D.C.  
° ALSO ADMITTED IN LOUISIANA

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

Re: *Hapag-Lloyd Aktiengesellschaft v. U.S. Oil Trading*,  
14-cv-9949(VEC)  
- and -  
*U.S. Oil Trading v. M/V VIENNA EXPRESS*,  
15-cv-6718 (VEC) (related action)

Dear Judge Caproni,

We represent Hapag-Lloyd in the referenced matters, which have recently been designated as “test cases” in the related interpleader cases. We are writing to request a one-week extension of the briefing deadlines set in the test cases. The attorneys involved in the related test cases join in this request, and no party in any of the other cases objects to this request.<sup>1</sup>

The reason for the request is that there is a significant maritime law international conference in New York during the week of May 1 through and including the night of May 6. The event involves the annual meeting of the U.S. Maritime Law Association which is being held this year in conjunction with the 42<sup>nd</sup> International Conference of the Comité Maritime International (“CMI”). A number of the lawyers involved in these cases, including the

<sup>1</sup> We canvassed the entire group and also provided a copy of this letter to everyone to determine if there is any objection to this request, and those that have responded have indicated their agreement to the request and this letter. No party has objected.

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undersigned, are responsible for holding committee meetings with the International Working Groups and otherwise having to attend several functions and meetings. Accordingly, the parties would appreciate if the briefing deadlines were adjusted by roughly an additional week such that the following deadlines will apply:

Motions shall be due May 13, 2016;  
Opposition briefs shall be due June 10, 2016 and  
Reply briefs shall be due July 13, 2016.<sup>2</sup>

We thank the Court for its time and consideration to this request.

Respectfully,

FREEHILL, HOGAN & MAHAR LLP

/s/ Gina M. Venezia

Gina M. Venezia

GMV:clc

cc: All counsel

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<sup>2</sup> The one week extension of this deadline would be July 8, but because of the intervening July 4 holiday, we are requesting until July 13.